

1 MR. COLE: Thank you, Your Honor. And according
2 to my records, this was received in the bankruptcy
3 proceeding as Exhibit Number 276. And it also appears as, I
4 believe, as Joint Exhibit Number 2, Appendix G. And on that
5 basis, I would offer it here.

6 MS. SCHMELTZER: No objection.

7 JUDGE FRYSIK: Received.

8 (The document referred to,
9 having been previously marked
10 for identification as Shurberg
11 Exhibit 71, was received in
12 evidence.)

13 MR. COLE: Thank you, Your Honor. Next, I'd like
14 to have marked for identification as Shurberg 72, a one-page
15 letter on Peabody & Brown letterhead, dated October 2, 1985,
16 addressed to Thomas Hart from Carter Bacon. And that would
17 be Shurberg 72.

18 JUDGE FRYSIK: It may be marked.

19 (The document referred to was
20 marked for identification as
21 Shurberg Exhibit 72.)

22 MR. COLE: And I will withhold offering that for
23 the time being, pending a witness.

24 And next, I would like to have marked for
25 identification as Shurberg Exhibit 73, a two-page document

1 consisting of a one-page letter on the letterhead of Baker &
2 Hostetler, dated April 18, 1986, addressed to Mr. Ramirez
3 and Herbert A. Sostek from Mr. Hart. And accompanying that
4 is a one-page document which appears to be an erratum issued
5 by the FCC on April 18, 1986.

6 I would like to have this two-page document
7 identified as Shurberg 73, please.

8 JUDGE FRYSIK: It may be marked.

9 (The document referred to was
10 marked for identification as
11 Shurberg Exhibit 73.)

12 MR. COLE: Thank you, Your Honor. And I will
13 withhold offering that, pending a witness.

14 Next, for the white file -- the white album. Your
15 Honor, I'd like to have marked for identification as
16 Shurberg Exhibit 74, an eight-page document, the first page
17 of which is a one-page memorandum on the letterhead of Baker
18 & Hostetler addressed to all Baker & Hostetler broadcast
19 clients from Jack W. Whitley, concerning annual ownership
20 reports due by August 3, 1987. And the date is March 13,
21 1987. And it is accompanied by an FCC public notice, and
22 then a blank copy of the FCC ownership report form and
23 finally, a listing of the filing deadlines for annual
24 ownership reports.

25 I'd like to have that marked for identification as

Heritage Reporting Corporation
(202) 628-4888

1 Shurberg 74.

2 JUDGE FRYSIAK: It may be marked.

3

4 (The document referred to was
5 marked for identification as
6 Shurberg Exhibit 74.)

7 MR. COLE: Thank you, Your Honor. This is a
8 document which appears in Joint Exhibit Number 1, Appendix
9 H. And on that basis, I don't think there's any dispute
10 about it, and I would like to move it into evidence.

11 MS. SCHMELTZER: No objection.

12 JUDGE FRYSIAK: Received.

13 (The document referred to,
14 having been previously marked
15 for identification as Shurberg
16 Exhibit 74, was received in
17 evidence.)

18 MR. COLE: Thank you, Your Honor. Next, Your
19 Honor, I'd like to have marked for identification as
20 Shurberg 75, a letter on the letterhead of Richard P.
21 Ramirez, dated May 5, 1987, addressed to Tom Hart over Mr.
22 Ramirez's signature.

23 And I'd like to have that identified as Shurberg
24 75, please.

25 JUDGE FRYSIAK: It may be so marked.

1 (The document referred to was
2 marked for identification as
3 Shurberg Exhibit 75.)

4 MR. COLE: This also bears a handwritten notation
5 at the bottom which is part of the exhibit, as I understand
6 it. The handwritten notation reads: "Dale, are we ready to
7 begin the annual ownership report for WHCT TV? Please
8 review." And then it's "THX," which I read to be "Thanks,"
9 and then an initial.

10 In Ms. Harberg's deposition at page 11, she
11 identified this as Mr. Hart's signature and the notation was
12 addressed to her.

13 And on that basis, I offer this into evidence.
14 That would be Ms. --

15 MS. SCHMELTZER: Well, she said -- this is on page
16 12. She said, "The first one looks to me like a T, and it
17 may be Tom Hart. I am not absolutely sure."

18 JUDGE FRYSIK: What page was it?

19 MS. SCHMELTZER: Page 12.

20 MR. COLE: Then it goes on. It says: "Do you
21 know if you were the Dale who was the addressee?" She said:
22 "I assume that I am." "Does that refresh your
23 recollection?" "Yeah, it doesn't refresh my recollection.
24 It just tells me that Hart may have written me a note."

25 MS. SCHMELTZER: Well, she said she wasn't

1 absolutely sure whether it was his handwriting or not.

2 JUDGE FRYSIK: Over the objection, I'll receive
3 it.

4

5 (The document referred to,
6 having been previously marked
7 for identification as Shurberg
8 Exhibit 75, was received in
9 evidence.)

10 MR. COLE: Thank you, Your Honor. Next, Your
11 Honor, I'd like to have marked for identification is
12 Shurberg Exhibit 76, a five-page document, the fifth page
13 which appears to be blank consisting of a one-page letter on
14 the letterhead of Baker & Hostetler, dated July 7, 1987,
15 addressed to Fred J. Boling signed by Thomas Hart. And
16 there's accompanying -- it is accompanied by a memorandum
17 addressed to Mr. Boling from Mr. Hart which consists of a
18 media ownership survey. And that memorandum is also dated
19 July 7, 1987.

20 And I would like to have this entire document
21 identified as Shurberg 76, please.

22 JUDGE FRYSIK: It may be marked.

23 (The document referred to was
24 marked for identification as
25 Shurberg Exhibit 76.)

1 MR. COLE: And I will withhold offering this at
2 this time, pending a witness.

3 Next, I would like to have marked for
4 identification as Shurberg 77, essentially identical
5 exhibit. It's a four-page document consisting of a one-page
6 cover letter, dated July 7, 1987 from Mr. Hart to Mr.
7 Ramirez. And accompanying that is a media ownership survey.

8 I would like to have that document identified as
9 Shurberg 77.

10 JUDGE FRYSIK: It may be marked.

11 (The document referred to was
12 marked for identification as
13 Shurberg Exhibit 77.)

14 MR. COLE: And I will withhold offering this,
15 pending a witness.

16 Next, I would like to have identified -- marked
17 for identification as Shurberg 78, a letter -- a four-page
18 document consisting of a one-page letter from Mr. Hart to
19 William Lance, dated July 7, transmitting to Mr. Lance the
20 media ownership survey.

21 I'd like that marked as Shurberg 78.

22 JUDGE FRYSIK: It may be marked.

23 (The document referred to was
24 marked for identification as
25 Shurberg Exhibit 78.)

1 MR. COLE: And I will withhold that one, as well.

2 Next, I'd like to have marked for identification a
3 four-page document consisting of a one-page cover letter
4 from Mr. Hart to Mr. Sostek also dated July 7, 1987. And
5 accompanying that is a memorandum from Mr. Sostek -- from
6 Mr. Hart to Mr. Sostek which is the media ownership survey
7 which we've seen in the last two exhibits.

8 I'd like to have this marked as Shurberg 79.

9 JUDGE FRYSIK: It may be marked.

10 (The document referred to was
11 marked for identification as
12 Shurberg Exhibit 79.)

13 MR. COLE: And I will withhold offering that for
14 the time being, pending a witness.

15 And next, I'd like to have marked for
16 identification as Shurberg 80, a five-page document
17 consisting of a one-page letter from Mr. Hart to a William
18 D. Kerchick of Peabody & Brown, dated July 7, 1987 and
19 transmitting to him the media ownership survey. That is,
20 transmitting from Mr. Hart to Mr. Kerchick the media
21 ownership survey.

22 I'd like to have this five-page document
23 identified as Shurberg 80, please.

24 JUDGE FRYSIK: It may be marked.

25 (The document referred to was

1 marked for identification as
2 Shurberg Exhibit 80.)

3 MR. COLE: Thank you, Your Honor. And I will
4 defer offering that for the time being.

5 Next, I would like to have marked for
6 identification a one-page document which is a memorandum on
7 the letterhead of Baker & Hostetler addressed to broadcast
8 clients from Baker & Hostetler concerning issues, programs,
9 lists and ownership reports dated July 7, 1987. It also has
10 a handwritten notation at the bottom which I believe is part
11 of the exhibit.

12 And I'd like to have that marked as Shurberg 81.

13 JUDGE FRYSIK: It may be marked.

14 (The document referred to was
15 marked for identification as
16 Shurberg Exhibit 81.)

17 MR. COLE: And I'm going to withhold this for the
18 time being, and I may withdraw this. But I'm going to
19 withhold it for the time being.

20 Next, I'd like to have marked for identification
21 as Shurberg 82, a six-page document. And I should point out
22 the first -- there are at least two pages of this which are
23 double-sided. Just so the record reflects, there are
24 double-sided documents. This is the way it came to me.
25 Consisting of what appears to be an ownership report or at

1 least a draft ownership report, FCC Form 323, which appears
2 to bear the signature of Mr. Ramirez, dated July 20, 1987,
3 and also, a number of editorial changes or revisions made by
4 hand.

5 And I'd like that marked as Shurberg 82.

6 JUDGE FRYSIAK: It may be marked.

7 (The document referred to was
8 marked for identification as
9 Shurberg Exhibit 82.)

10 MR. COLE: And Your Honor, Ms. Harberg, during her
11 deposition, was shown this document and she identified the
12 handwritten notations on this as her own at pages 16 and 17
13 of her deposition. Actually, starting on the bottom of page
14 16:

15 "Q Is that your handwriting in the upper left-
16 hand corner?"

17 "A It is down at the lower right-hand corner."

18 "Q Is that your handwriting on page 2?"

19 "A It appears to be."

20 "Q Is that Mr. Ramirez's handwriting on the
21 signature line?"

22 "A It looks as though it is his signature. I
23 don't have any independent knowledge of that."

24 And she does conclude it is her handwriting on
25 this document. On that basis, I offer this into evidence as

1 Shurberg 82.

2 MS. SCHMELTZER: No objection.

3 JUDGE FRYSIAK: Received.

4

5 (The document referred to,
6 having been previously marked
7 for identification as Shurberg
8 Exhibit 82, was received in
9 evidence.)

10 MR. COLE: Thank you, Your Honor. Next, Your
11 Honor, I have a document which is four pages in length, and
12 these are long pages folded in. I state that for the
13 record. Consists of a -- one page of handwritten notations,
14 and then a second -- then, three pages in different
15 handwriting. It appears to be a note or memorandum dated
16 July 24, 1987 addressed to Dale. And there was a name
17 apparently added as a signature but it was crossed out.

18 And I'd like to have this four-page document
19 identified as Shurberg 83.

20 JUDGE FRYSIAK: It may be marked.

21 (The document referred to was
22 marked for identification as
23 Shurberg Exhibit 83.)

24 MR. COLE: And Your Honor, during the deposition
25 of Ms. Harburg, she was shown page 1 of this, and she

1 identified that handwriting as her own at page 23. I'm
2 sorry. It begins at 23, goes over to 24.

3 "Q Directing your attention to the first page,
4 is that your handwriting?"

5 "A It appears to be."

6 "Q Directing your attention to the rest of it -
7 - she did not recognize that handwriting, so at least the
8 first page, I believe, has been identified as Ms. Harberg's
9 handwriting."

10 Mr. Dudley was shown pages 2, 3 and 4 of this
11 document. And at page 13 and 14 of his deposition
12 transcript, he identified that: "It appears to be my
13 handwriting" he states on page 14.

14 And on that -- on the basis of those
15 identifications, I offer this into evidence.

16 MS. SCHMELTZER: No objection.

17 JUDGE FRYSIK: Received.

18 (The document referred to,
19 having been previously marked
20 for identification as Shurberg
21 Exhibit 83, received in
22 evidence.)

23 MR. COLE: Thank you, your Honor. Next, I have --
24 I would like to have marked for identification as Shurberg
25 84, a document which again, appears to be a draft ownership

1 report, partially completed. It is a two-page -- it is a
2 two-side -- one page, two-sided document with handwritten
3 notations on it.

4 And I would like to have that identified as
5 Shurberg 84, please.

6 JUDGE FRYSIK: It may be marked.

7 (The document referred to was
8 marked for identification as
9 Shurberg Exhibit 84.)

10 MR. COLE: Ms. Harburg was shown this during her
11 deposition at page 20 and asked to identify her handwriting
12 on it, on both pages 1 and on page 2, that's at the back of
13 page 1. And she acknowledged that it appears to be her
14 handwriting in both instances at page 20 and 21 of her
15 deposition testimony.

16 And on that basis, I offer this document as
17 Shurberg 84.

18 MS. SCHMELTZER: Could you tell us where you
19 identified for her what the document is?

20 MR. COLE: Page 20.

21 "Q I show you a one-page, double-sided,
22 unexecuted FCC ownership report --"

23 MS. SCHMELTZER: I'm sorry. Slow down. I think I
24 have the wrong deposition.

25 MR. COLE: After a while they all start to look

1 alike. Dale Harburg at page 20.

2 MS. SCHMELTZER: Okay.

3 JUDGE FRYSIAK: Received.

4

5 (The document referred to,
6 having been previously marked
7 for identification as Shurberg
8 Exhibit 84, was received in
9 evidence.)

10 MR. COLE: Thank you, Your Honor. Next, I'd like
11 to have marked for identification a one-page document which
12 is a letter on the stationery of Peabody & Brown, dated July
13 28, 1987 addressed to Dale Harburg in care of Thomas A.
14 Hart, bearing the signature line for Carter Bacon, but it
15 appears to have been signed. Mr. Bacon's name appears to
16 have been signed by someone else.

17 And I would like to have that marked for
18 identification as Shurberg 85.

19 JUDGE FRYSIAK: It may be marked.

20 (The document referred to was
21 marked for identification as
22 Shurberg Exhibit 85.)

23 MR. COLE: And I believe this appears in Joint
24 Exhibit Number 2, Appendix I. On that basis, I offer it in
25 evidence here.

1 MS. SCHMELTZER: No objection.

2 JUDGE FRYSIAK: Received.

3

4

5

(The document referred to,

6

having been previously marked

7

for identification as Shurberg

8

Exhibit 85, was received in

9

evidence.)

10

MR. COLE: Next, I would like to have marked for

11

identification as Shurberg Number 86, a document 12 pages in

12

length, which consists of a one-page cover letter, and the

13

stationery is Baker & Hostetler, dated July 29, 1987

14

addressed to Richard Ramirez from Dale R. Harburg. And

15

accompanying that is an unexecuted ownership report form for

16

Astroline Communications Company Limited Partners.

17

I'd like to have this 12-page document identified

18

as Shurberg 86.

19

JUDGE FRYSIAK: It may be marked.

20

(The document referred to was

21

marked for identification as

22

Shurberg Exhibit 86.)

23

MR. COLE: Ms. Harburg, during her deposition, was

24

shown this. And on pages 29 to 30, starting at the bottom:

25

"Q I'll show you another document -- a multi-

1 page document, the first page of which is a letter. Is that
2 your signature on the letter?"

3 "A Yes, it is."

4 "Q It's a letter from you addressed to Richard
5 Ramirez, enclosed, blah, blah, blah. Did I read that
6 correctly?"

7 "A Yes."

8 I ask her:

9 "Q Is it reasonable to conclude from this
10 document that as of July 29 you had prepared a revised
11 ownership report which you thought Mr. Ramirez would be able
12 to sign?"

13 "A It is reasonable to conclude I sent Mr.
14 Ramirez a revised ownership report. I do not have any
15 recollection of preparing the report."

16 On that basis, I offer it into evidence here.

17 MS. SCHMELTZER: No objection.

18 JUDGE FRYSIK: Received.

19 (The document referred to,
20 having been previously marked
21 for identification as Shurberg
22 Exhibit 86, received in
23 evidence.)

24 MR. COLE: Thank you, Your Honor. Next, I'd like
25 to have marked for identification as Shurberg 87, a 16-page

1 document, first page of which is a telecopier cover letter
2 page from Baker & Hostetler from Ms. Harburg to Mr. Bacon
3 dated July 31, 1987. And accompanying that is what appears
4 to be a draft ownership report. That is an unexecuted
5 ownership report for Astroline Communications Company
6 Limited Partnership.

7 There are handwritten notations on the cover page
8 and on several of the draft ownership report pages. I
9 believe all of those are original annotations that would be
10 properly considered as part of the exhibit except for on the
11 cover page, there is a handwritten note that says "Hart DEP
12 41." And that referred -- that's a notation I made during
13 Mr. Hart's deposition.

14 But with the exception of that, I would include
15 all of the notations on this as part of the exhibit. And
16 with that identification, I would like to have this document
17 marked as Shurberg 87.

18 JUDGE FRYSIAK: It may be marked.

19 (The document referred to was
20 marked for identification as
21 Shurberg Exhibit 87.)

22 MR. COLE: Thank you, Your Honor. And Ms. Harburg
23 was shown this document at pages 32 and 33 of her
24 deposition. Ms. Harburg was shown this. I do not have a
25 specific point where she says, "Yes, that's my handwriting"

1 anywhere. So, I will withhold this one, pending Mr. Hart
2 taking the stand, because he did identify his handwriting on
3 that.

4 Next, I would like to have marked for
5 identification as Shurberg 88, a document which is 16 pages
6 in length which is essentially the same document as that
7 which was marked as Shurberg 87, but it has different
8 notations on the cover page and different notations on the
9 draft ownership report form. And I would like to have that
10 marked as Shurberg 88.

11 JUDGE FRYSIK: It may be marked.

12 (The document referred to was
13 marked for identification as
14 Shurberg Exhibit 88.)

15 MR. COLE: And this was also presented to Ms.
16 Harburg at pages 38 through 40 of her deposition transcript.
17 And she identified her handwriting on the front page and
18 also in the draft report.

19 And on that basis, I offer this into evidence.

20 MS. SCHMELTZER: No objection.

21 JUDGE FRYSIK: Eighty-eight's received.

22 (The document referred to,
23 having been previously marked
24 for identification as Shurberg
25 Exhibit 88, was received in

1 evidence.)

2 MR. COLE: Thank you, Your Honor. Next, I have a
3 16-page document which I would like marked for
4 identification as Shurberg 89. And this is yet another copy
5 of the document which we have seen in Shurberg 87 and 88.
6 With this, there is yet more handwritten -- more and
7 different handwritten notations.

8 And I would like to have this document identified
9 as Shurberg 89.

10 JUDGE FRYSIAK: It may be so marked.

11 (The document referred to was
12 marked for identification as
13 Shurberg Exhibit 89.)

14 MR. COLE: And I will defer offering this, pending
15 a witness.

16 Next, I'd like to have marked for identification a
17 three-page document which is an Order issued by the United
18 States Court of Appeals for the District of Columbia Circuit
19 filed on Jun 25, 1987, in Case No. 841660 which was Shurberg
20 Broadcasting v. FCC. It consists of a one-paragraph order
21 on page 1, and then a one-and-a-half page dissent from Judge
22 Silverman.

23 I'd like to have that marked as Shurberg 90.

24 JUDGE FRYSIAK: It may be marked.

25 (The document referred to was

1 marked for identification as
2 Shurberg Exhibit 90.)

3 MR. COLE: Thank you, Your Honor. I believe
4 official notice can be taken of this. It is an official
5 court document, and I would move it on that basis. Mr. Hart
6 did testify about this in his deposition, and I will ask him
7 about it. But based on -- it is an official document from
8 the Court of Appeals, and I would request that it be
9 received into evidence as such.

10 MS. SCHMELTZER: No objection.

11 JUDGE FRYSIK: Received.

12 (The document referred to,
13 having been previously marked
14 for identification as Shurberg
15 Exhibit 90, was received in
16 evidence.)

17 MR. COLE: Thank you, Your Honor. Next, I would
18 like to have marked for identification as Shurberg 91, a 14-
19 page document which is an FCC ownership report. And this
20 also has double-sided pages, I should point out for the
21 record. An FCC ownership report for Astroline Communication
22 Company Limited Partnership which appears to be executed by
23 Richard Ramirez and dated July 31, 1987.

24 I'd like to have this marked for identification as
25 Shurberg 91, please.

1 JUDGE FRYSIK: It may be marked. 91?

2 MR. COLE: Yes, 91.

3 JUDGE FRYSIK: Okay.

4

5 (The document referred to was
6 marked for identification as
7 Shurberg Exhibit 91.)

8 MR. COLE: And at pages -- page 42, Ms. Harburg's
9 deposition, I showed her this and asked her:

10 "Q Is that Mr. Ramirez's signature as far as
11 you can tell?"

12 And she said:

13 "A It appears to be."

14 "Q And that is dated July 31, 1987, is it not?"

15 "A Yes, it is. Correct."

16 And so forth. And on that basis, I'd offer this
17 as Shurberg 91.

18 MS. SCHMELTZER: No objection.

19 JUDGE FRYSIK: Received.

20 (The document referred to,
21 having been previously marked
22 for identification as Shurberg
23 Exhibit 91, was received in
24 evidence.)

25 MR. COLE: Next, I would like to have marked for

1 identification as Shurberg 92, a two-page document
2 consisting of a one-page cover letter on Peabody & Brown
3 letterhead, dated August 31, 1988, addressed to Mr. Hart
4 from Mr. Bacon. And accompanying it, is a schedule of
5 partners and percentage interests, dated August 31, 1988 for
6 Astroline Communications Company Limited Partnership.

7 I'd like to have that marked as Shurberg 92,
8 please.

9 JUDGE FRYSIAK: It may be marked.

10 (The document referred to was
11 marked for identification as
12 Shurberg Exhibit 92.)

13 MR. COLE: Thank you, Your Honor. I'll withhold
14 offering this, pending a witness.

15 Next, I would like to have identified as Shurberg
16 93, a two-page document which is a bill sent by Baker &
17 Hostetler to Astroline Communications Company Limited
18 Partnership. It's dated July 27, 1987. And it covers the
19 period June 1 to 31 -- through 30, 1987.

20 I'd like to have that marked as Shurberg 93.

21 JUDGE FRYSIAK: It may be marked.

22 (The document referred to was
23 marked for identification as
24 Shurberg Exhibit 93.)

25 MR. COLE: I should point out there are

1 notations -- handwritten notations on page 2, which I
2 believe are part of the original exhibit. That is, they
3 were not put in after the fact, but I don't know that for a
4 fact. In any event, I do not believe I will -- that those
5 are going to be relevant -- anything I'm concerned about.
6 But I will withhold offering that for the time being,
7 pending a witness.

8 Next, I'd like to have marked for identification
9 Shurberg 94, which is a two-page document consisting of a
10 bill sent by Baker & Hostetler to Astroline Communication
11 Company Limited Partnership, dated August 24, 1987 for the
12 period July 1 through 31, 1987.

13 And I'd like to have that marked as Shurberg 94.

14 JUDGE FRYSIK: It may be marked.

15 (The document referred to was
16 marked for identification as
17 Shurberg Exhibit 94.)

18 MR. COLE: And I will defer offering that, pending
19 a witness.

20 Next, I'd like to have marked as Shurberg 95, a
21 three-page document which is a bill sent by Baker &
22 Hostetler to Astroline Communications Company Limited
23 Partnership, dated September 24, 1987 for the period August
24 1 through 31, 1987.

25 I'd like to have that marked as Shurberg 95.

1 JUDGE FRYSIAK: It may be marked.

2 (The document referred to was
3 marked for identification as
4 Shurberg Exhibit 95.)

5 MR. COLE: And I will defer offering that as well.

6 And I would like to have marked next as Shurberg
7 96, a one-page document which is a letter on Baker &
8 Hostetler letterhead, dated September 7, 1988 addressed to
9 Richard P. Ramirez from Thomas Hart.

10 I'd like to have that marked Shurberg 96, please.

11 JUDGE FRYSIAK: It may be marked.

12 (The document referred to was
13 marked for identification as
14 Shurberg Exhibit 96.)

15 MR. COLE: And I will defer offering that as well
16 for the time being.

17 Next, I'd like to have marked for identification,
18 a five-page document consisting of a one-page cover letter
19 on Baker & Hostetler letterhead, dated September 8, 1988 to
20 Richard Ramirez from Linda Bocchi and transmitting what
21 appears to be at least a portion of a short pro forma. That
22 is a short form 316 assignment application relative to
23 Astroline or relative to WHCT Management, Inc.

24 And I would like to have that marked for
25 identification as Shurberg 97.

1 JUDGE FRYSIAK: It may be marked.

2 (The document referred to was
3 marked for identification as
4 Shurberg Exhibit 97.)

5 MR. COLE: Thank you, Your Honor. During her
6 deposition, Ms. Bocchi was shown this document. And she
7 identified her signature on the cover letter indicating that
8 that was her letter.

9 And on that basis, I offer this as Shurberg 97.

10 MS. SCHMELTZER: Can you --

11 MR. COLE: I'm sorry. It's Bocchi page 12.
12 That's a one-page letter dated September 8, 1988 addressed
13 to Richard Ramirez.

14 "Q Is that your signature?"

15 "A It appears to be."

16 MS. SCHMELTZER: No objection.

17 JUDGE FRYSIAK: Did she say --

18 MR. COLE: She said -- I think she said no
19 objection.

20 MS. SCHMELTZER: I'm sorry.

21 JUDGE FRYSIAK: Received.

22 (The document referred to,
23 having been previously marked
24 for identification as Shurberg
25 Exhibit 97, was received in

1 evidence.)

2 MR. COLE: Next, I would like marked for
3 identification Shurberg 98, a five-page document consisting
4 of a one-page cover letter on the letterhead of Baker &
5 Hostetler, dated September 12, 1988, addressed to Carter
6 Baker, signed by Linda Bocchi and transmitting an unsigned
7 of what appears to be a draft ownership report for Astroline
8 Communications Company Limited Partners. And I should also
9 point out for the record that at least one of the pages in
10 the ownership report was double-sided and is double-sided as
11 it appears in the copies I've exchanged.

12 I'd like to have this marked as Shurberg 98.

13 JUDGE FRYSIK: It may be marked.

14 (The document referred to was
15 marked for identification as
16 Shurberg Exhibit 98.)

17 MR. COLE: Thank you, Your Honor. And Ms. Bocchi
18 was shown this document at page 17 of her deposition. "I'll
19 show you another document dated September 12," which is a
20 letter again on Baker & Hostetler stationery addressed to
21 Mr. Bacon.

22 "Q Is that your signature on that letter?"

23 "A It appears to be."

24 And on that basis, I offer Shurberg 98.

25 MS. SCHMELTZER: No objection.

1 JUDGE FRYSIAK: Received.

2

3

4

5

(The document referred to,
having been previously marked
for identification as Shurberg
Exhibit 98, was received in
evidence.)

6

7

8

9

10 MR. COLE: Next, I have a one-page document which
11 I'd like marked for identification as Shurberg 99, which is
12 a letter on WHCT 18 stationery dated December 4, 1985
13 addressed to Bill Blair, Cash Management, Office Towers #2,
14 Waterbury, Connecticut, from Al Rozanski, Business Manager.

15 I'd like to have this marked as Shurberg 99.

16 JUDGE FRYSIAK: It may be marked.

17

(The document referred to was
marked for identification as
Shurberg Exhibit 99.)

18

19

20 MR. COLE: And this was received into evidence, I
21 believe in the bankruptcy court as Exhibit Number 22. On
22 that basis, I offer it here.

23

24 MS. SCHMELTZER: We're not objecting to the
25 authenticity, Your Honor, but I do object to the relevance
of the document.

1 having previously been marked
2 for identification as Shurberg
3 Exhibit 99, was withdrawn.)

4 MR. COLE: Next, Your Honor, I'd like to have
5 marked for identification as Shurberg Number 100, a letter
6 one-page in length on WHCT 18 letterhead dated February 3,
7 1986 addressed to Fred Boling from Mr. Ramirez. And that
8 would be Shurberg 100.

9 JUDGE FRYSIK: It may be marked.

10 (The document referred to was
11 marked for identification as
12 Shurberg Exhibit 100.)

13 MR. COLE: And this, according to my records, was
14 received in the bankruptcy proceeding as Exhibit Number 78.
15 And on that basis, I offer it here.

16 MS. SCHMELTZER: No objection.

17 JUDGE FRYSIK: Received.

18 (The document referred to,
19 having been previously marked
20 for identification as Shurberg
21 Exhibit 100, was received in
22 evidence.)

23 MR. COLE: Thank you, Your Honor. Next, I would
24 like to have marked for identification a one-page document
25 which is a letter on Arthur Andersen letterhead, dated April

1 22, 1986, addressed to Mr. Ramirez from a George R. Nebel.

2 And I'd like to have that marked Shurberg 101.

3 JUDGE FRYSIK: It may be marked.

4

5 (The document referred to was
6 marked for identification as
7 Shurberg Exhibit 101.)

8 MR. COLE: Thank you. This, according to my
9 records was received in evidence in the bankruptcy court as
10 Exhibit Number 84. And on that basis, I offer it here.

11 MS. SCHMELTZER: No objection.

12 JUDGE FRYSIK: Received.

13 (The document referred to,
14 having been previously marked
15 for identification as Shurberg
16 Exhibit 101, was received in
17 evidence.)

18 MR. COLE: Thank you, Your Honor. Next, Your
19 Honor, I'd like to have marked for identification as
20 Shurberg Exhibit 102, a two-page document consisting of a
21 one-page letter on the letterhead of Astroline Corporation,
22 dated May 13, 1986 addressed to a Sandra Donnolyn from
23 Richard J. Sullivan, Astroline Corporation and transmitting
24 page 2, which is an authority for deposit and borrowing.

25 And I'd like to have this marked as Exhibit --

1 Shurberg Number 102.

2 JUDGE FRYSIAK: It may be marked.

3

4

5 (The document referred to was
6 marked for identification as
7 Shurberg Exhibit 102.)

8 MR. COLE: And I believe this document as it
9 stands here was received into evidence as -- in the
10 bankruptcy proceeding as Exhibit Number 85. And on that
11 basis, I would like to offer it here.

12 MS. SCHMELTZER: No objection.

13 JUDGE FRYSIAK: Received.

14 (The document referred to,
15 having been previously marked
16 for identification as Shurberg
17 Exhibit 102, was received in
18 evidence.)

19 MR. COLE: I should point out, Your Honor, that
20 page 2 as you'll see in the next exhibit -- page 2, I
21 understand, was a long legal-sized page which was -- appears
22 to have been cut off in this copy. But we do have elsewhere
23 in the bankruptcy record, the full copy -- the full long
24 copy of it. But I wanted to state for the record that as
25 far as I know, the document which will soon be identified as

1 Shurberg 103 is a full copy of that which was originally
2 included as the second page of Shurberg 102.

3 In any event, moving to Shurberg 103, I'd like to
4 have marked for identification as Shurberg 103, a one-page
5 document, which again is the long page folded up entitled,
6 "Authority for Deposit and Borrowing" and bearing the
7 signature at the bottom, it would appear, of Fred Boling.

8 I'd like to have that marked as Shurberg 103.

9 JUDGE FRYSIK: It may be marked.

10 (The document referred to was
11 marked for identification as
12 Shurberg Exhibit 103.)

13 MR. COLE: This was received into evidence -- this
14 document was received in evidence in the bankruptcy
15 proceeding as Exhibit Number 217. And on that basis, I
16 offer it here.

17 MS. SCHMELTZER: No objection.

18 JUDGE FRYSIK: Received.

19 (The document referred to,
20 having been previously marked
21 for identification as Shurberg
22 Exhibit 103, was received in
23 evidence.)

24 MR. COLE: Next, Your Honor, I'd like to have
25 marked for identification a two-page document, first page of

1 which is a one-page cover letter on the stationery WHCT 18,
2 dated May 29, 1986 addressed to Fred Boling from Richard
3 Ramirez. And it's accompanied by a one-page memorandum --
4 interoffice memorandum to Richard from Al, dated May 28,
5 1986.

6 I'd like this two-page document identified as
7 Shurberg 104, please.

8 JUDGE FRYSIK: It may be marked.

9 (The document referred to was
10 marked for identification as
11 Shurberg Exhibit 104.)

12 MR. COLE: And this was -- this document,
13 according to my records, was received in the bankruptcy
14 court as Exhibit Number 87. And on that basis, I offer it
15 here.

16 MS. SCHMELTZER: No objection.

17 JUDGE FRYSIK: Received.

18 (The document referred to,
19 having been previously marked
20 for identification as Shurberg
21 Exhibit 104, was received in
22 evidence.)

23 MR. COLE: Again, trying to be attentive to
24 handwritten notations, there is a handwritten notation on
25 the first page of this, which I don't know where it came

1 from or who put it there, but I do not intend to rely on
2 that handwritten notation and I'm not sure if it's part of
3 the exhibit.

4 Next, I'd like to have marked for identification a
5 two-page document which is -- both pages are long pages.
6 It's entitled at the top, "Bank of Boston Commercial Deposit
7 Account Resolutions and Authorities for Opening and
8 Maintaining Deposit Accounts." It's been completed in the
9 name of Astroline Communications, or at least it's been
10 typed in, in the name of Astroline Communications. And it
11 appears to bear on page 2 at least the signature of Mr.
12 Ramirez.

13 I'd like to have this marked for identification as
14 Shurberg 105.

15 JUDGE FRYSIK: It may be marked.

16 (The document referred to was
17 marked for identification as
18 Shurberg Exhibit 105.)

19 MR. COLE: And this, I believe, was received into
20 evidence in the bankruptcy proceeding as Exhibit Number 50.
21 And on that basis, I offer it here.

22 MS. SCHMELTZER: No objection.

23 JUDGE FRYSIK: It is received.

24 (The document referred to,
25 having been previously marked

1 for identification as Shurberg
2 Exhibit 105, was received in
3 evidence.)

4 MR. COLE: Thank you, Your Honor. Next, I'd like
5 to have marked for identification a ten-page document
6 consisting of a one-page interoffice memo to Fred Boling,
7 Jr. from Richard P. Ramirez, dated June 29, 1988. It's on
8 WHCT 18 stationery of some sort. And it's accompanied by a
9 number of documents which are included in their title or
10 their heading, "Transmittal Number" and then a number is
11 handwritten. And these consist of long lists of invoices,
12 invoice dates pays, invoice numbers and so forth.

13 I'd like to have this ten-page document identified
14 as Shurberg 106. I should point out that there are
15 handwritten notations, some of which I believe were part of
16 the original exhibit and are therefore relevant to this
17 proceeding.

18 I believe the questions -- and it's possible that
19 Mr. Hoffman or someone who was a participant in the
20 bankruptcy proceeding could enlighten us on this. But I
21 believe that the handwritten notations in the middle of the
22 page -- what does "okay" -- something, "status of funding at
23 this time" -- I -- those are -- were added by attorneys
24 after the fact. But I believe the "okay" and the initial at
25 the top of the page and the "return 6371 to Hartford" were

1 part of the original document.

2 In any event, this was received in the bankruptcy
3 proceeding as Exhibit Number 35. And on that basis, I offer
4 it here.

5 MS. SCHMELTZER: I would agree with Mr. -- I would
6 agree that the things -- "what does okay" -- it looks like
7 "what does okay mean?" And the -- also, the notation below
8 that and the notation up at the top about "no date" those
9 apparently were written by lawyers. I have -- I have no
10 knowledge about the rest of the writing on the page.

11 And that's up to Mr. Cole to develop. But with
12 that caveat, I have no objections.

13 JUDGE FRYSIK: All right. 106 is received.

14 (The document referred to was
15 marked for identification as
16 Shurberg Exhibit 106, and was
17 received in evidence.)

18 MR. COLE: Thank you, Your Honor. Next, I'd like
19 to have marked for identification as Shurberg 107, a one-
20 page document which is a letter on the letterhead of Peabody
21 & Brown, dated February 4, 1987 addressed to Thomas Hart
22 from Barbara Coleran. And this includes on the bottom a
23 handwritten notation which reads, "Barbara, thank you." And
24 then some initials, which I believe are the initials of
25 Thomas Hart.

1 But in any event, I'd like this one page document
2 identified as Shurberg 107.

3 JUDGE FRYSIAK: It may be marked.

4

5

6 (The document referred to was
7 marked for identification as
8 Shurberg Exhibit 107.)

9 MR. COLE: Thank you, Your Honor. And this, I
10 believe was received into evidence in the bankruptcy
11 proceeding as Exhibit Number 105. And on that basis, I
12 offer it here.

13 MS. SCHMELTZER: No objection.

14 JUDGE FRYSIAK: Received.

15 (The document referred to,
16 having been previously marked
17 for identification as Shurberg
18 Exhibit 107, was received in
19 evidence.)

20 MR. COLE: Thank you, Your Honor. Next, I would
21 like marked for identification as Shurberg Number 108, a
22 letter on the letterhead of Richard P. Ramirez, dated April
23 20, 1987 addressed to Fred Boling from Mr. Ramirez.

24 And I'd like that marked as Shurberg 108, please.

25 JUDGE FRYSIAK: It may be marked.

1 (The document referred to was
2 marked for identification as
3 Shurberg Exhibit 108.)

4 MR. COLE: And this, I believe, was received in
5 the bankruptcy proceeding as Exhibit Number 116. And on
6 that basis, I offer it here.

7 MS. SCHMELTZER: No objection.

8 JUDGE FRYSIK: Received.

9 (The document referred to,
10 having been previously marked
11 for identification as Shurberg
12 Exhibit 108, was received in
13 evidence.)

14 MR. COLE: Next, I have a -- I'd like marked for
15 identification as Shurberg Exhibit 109, a two-page document
16 which consists of a one-page cover letter from Mr. Ramirez,
17 dated April 20, 1987 from Mr. Ramirez, and then a one-page
18 table or spreadsheet of figures titled, "Model for Future or
19 -- I assume it says WHCT, which is hardly legible. But it
20 says, "Model for Future."

21 I'd like that marked as Shurberg 109.

22 JUDGE FRYSIK: It may be marked.

23 (The document referred to was
24 marked for identification as
25 Shurberg Exhibit 109.)

1 MR. COLE: Thank you, Your Honor. And this, I
2 believe, was received into evidence as Exhibit Number 117 in
3 the bankruptcy proceeding. And on that basis, I offer it
4 here.

5 MS. SCHMELTZER: No objection.

6 JUDGE FRYSIAK: Received.

7 (The document referred to,
8 having been previously marked
9 for identification as Shurberg
10 Exhibit 109, was received in
11 evidence.)

12 MR. COLE: Thanks, Your Honor. Next, I would like
13 to have marked for identification as Shurberg Number 110, a
14 12-page document consisting of a two-page -- what appears to
15 be a letter, not signed, dated July 21, 1988 addressed to
16 Fred Boling with a typed signature or typed name at the
17 bottom, "Rich," listing a number of transmittal items which
18 were necessary for Mr. Boling's attention, and then
19 accompanied by multiple transmittals of the same sort we saw
20 in an earlier exhibit.

21 I'd like to have this marked for identification as
22 Shurberg Exhibit 110.

23 JUDGE FRYSIAK: It may be marked.

24 (The document referred to was
25 marked for identification as

1 Shurberg Exhibit 110.)

2 MR. COLE: And my understanding is this was
3 received in bankruptcy as Exhibit Number 130. And on that
4 basis, I offer it here.

5 MS. SCHMELTZER: No objection.

6 JUDGE FRYSIK: Received.

7 (The document referred to,
8 having been previously marked
9 for identification as Shurberg
10 Exhibit 110, was received in
11 evidence.)

12 MR. COLE: Thank you, Your Honor. I should also
13 point out that the handwritten notations of "okay" and "no"
14 on the first two pages, I believe were part of the
15 original -- the original exhibit as it was introduced up in
16 Hartford.

17 Next, I would like to have marked for
18 identification a two-page document, consisting of a one-page
19 cover memorandum or facsimile transmission cover page on
20 WHCT 18 letterhead, addressed to Fred Boling from Richard
21 Ramirez, dated August 10, 1988. And it's accompanied by a
22 typed note addressed to Fred Boling and -- with no
23 signature, but at the end of the two line note, it says,
24 "Thanks. R.R."

25 And I'd like to have this marked for

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(202) 628-4888

1 identification Shurberg 111.

2 JUDGE FRYSIK: It may be marked.

3 (The document referred to was
4 marked for identification as
5 Shurberg Exhibit 111.)

6 MR. COLE: And this, I believe, was received into
7 the bankruptcy court -- bankruptcy proceeding as Exhibit
8 Number 132. And on that basis, I offer it here.

9 MS. SCHMELTZER: No objection.

10 JUDGE FRYSIK: Received.

11 (The document referred to,
12 having been previously marked
13 for identification as Shurberg
14 Exhibit 111, was received in
15 evidence.)

16 MR. COLE: Thank you, Your Honor. Next, I'd like
17 to have marked for identification Shurberg Exhibit 112, a
18 six-page document consisting of a one-page cover letter on
19 the letterhead of WHCT TV, dated July 18, 1985 addressed to
20 six separate individuals and signed by Mr. Ramirez. And
21 accompanied by that is a five-page document entitled,
22 "Tentative True Lease Proposal for Astroline Communications
23 Company Limited Partnership."

24 And I would like to have this marked for
25 identification as Shurberg 112.

1 JUDGE FRYSIAK: It may be marked. .

2 (The document referred to was
3 marked for identification as
4 Shurberg Exhibit 112.)

5 MR. COLE: And I believe, but I'm not sure that
6 the handwritten notations on this were part of the original
7 exhibit. But I, at this point, am not planning on relying
8 on handwritten notations in any meaningful way in this
9 proceeding, but I just point that out that I believe they
10 were original notations.

11 In any event, this was, I believe, received in the
12 bankruptcy proceeding as Exhibit Number 64. And I hereby
13 offer it based on that.

14 MS. SCHMELTZER: No objection.

15 JUDGE FRYSIAK: Received.

16 (The document referred to,
17 having been previously marked
18 for identification as Shurberg
19 Exhibit 112, was received in
20 evidence.)

21 MR. COLE: Thank you, Your Honor. Next, I'd like
22 to have marked for identification as Shurberg 113, a one-
23 page letter on WHCT stationery, dated September 30, 1985
24 addressed to Astroline Communications Company and Mr. Fred
25 Boling from Richard P. Ramirez.

1 I'd like to have that marked as Shurberg 113.

2 JUDGE FRYSIAK: It may be marked.

3 (The document referred to was
4 marked for identification as
5 Shurberg Exhibit 113.)

6 MR. COLE: And this was received in the bankruptcy
7 proceeding as Exhibit Number 67. And on that basis, I offer
8 it here.

9 MS. SCHMELTZER: No objection.

10 JUDGE FRYSIAK: Received.

11 (The document referred to,
12 having been previously marked
13 for identification as Shurberg
14 Exhibit 113, was received in
15 evidence.)

16 MR. COLE: Thank you, Your Honor. Next, I have a
17 one-page document which is a letter on WHCT stationery,
18 dated November 4, 1985 addressed to "Dear Herb" from Mr.
19 Ramirez. And I'd like to have that marked for
20 identification as Shurberg 114.

21 JUDGE FRYSIAK: It may be marked.

22 (The document referred to was
23 marked for identification as
24 Shurberg Exhibit 114.)

25 MR. COLE: Thank you. And this was received in

1 the bankruptcy action as Exhibit Number 71. And on that
2 basis, I offer it here.

3 MS. SCHMELTZER: No objection.

4 JUDGE FRYSIAK: Received.

5

6 (The document referred to,
7 having been previously marked
8 for identification as Shurberg
9 Exhibit 114, was received in
10 evidence.)

11 MR. COLE: Next, I'd like to have marked for
12 identification a three-page document. It's just going to be
13 a one-page cover letter on WHCT stationery, dated December
14 9, 1985 addressed to Fred Boling from Mr. Ramirez. It's
15 accompanied by a two-page document, one of which is
16 attributed to an R. LaPlante, dated December 9, 1985, and
17 the second page of which is entitled, "Why WHCT didn't reach
18 reportable viewing levels for all dayparts in the November
19 1985 Nielsen ratings?"

20 I'd like to have the three-page document marked as
21 Shurberg 115.

22 JUDGE FRYSIAK: It may be marked.

23 (The document referred to was
24 marked for identification as
25 Shurberg Exhibit 115.)

1 MR. COLE: And this document was received into
2 evidence in the bankruptcy proceeding as Exhibit Number 72.
3 And on that basis, I offer it here.

4 MS. SCHMELTZER: No objection.

5 JUDGE FRYSIK: Received.

6 (The document referred to,
7 having been previously marked
8 for identification as Shurberg
9 Exhibit 115, was received in
10 evidence.)

11 MR. COLE: Thank you. Next, I would like marked
12 for identification as Shurberg 116, a one-page document
13 which consists of a memorandum on WHCT stationery, dated
14 January 29, 1986 to Herb Sostek from Rich concerning Red Sox
15 sports programming.

16 I'd like to have this marked as Shurberg 116.

17 JUDGE FRYSIK: It may be marked.

18 (The document referred to was
19 marked for identification as
20 Shurberg Exhibit 116.)

21 MR. COLE: And this was received in evidence, I
22 believe, in the bankruptcy proceeding as Exhibit Number 76.
23 And on that basis, I offer it here.

24 MS. SCHMELTZER: No objection.

25 JUDGE FRYSIK: Received.

1 (The document referred to,
2 having been previously marked
3 for identification as Shurberg
4 Exhibit 116, was received in
5 evidence.)

6 MR. COLE: Thank you. Next, I would like marked
7 for identification as Shurberg Number 117, a one-page
8 document which is a letter on the letterhead of Astroline
9 Corporation, dated February 15, 1986 addressed to Mr. Hart
10 from Mr. Sostek.

11 I'd like to have that marked for identification as
12 Shurberg 117.

13 JUDGE FRYSIK: It may be so marked.

14 (The document referred to was
15 marked for identification as
16 Shurberg Exhibit 117.)

17 MR. COLE: And I will withhold this, pending a
18 witness.

19 Next, I'd like to have marked for identification
20 as Shurberg 118, a two-page letter on the letterhead of
21 Baker & Hostetler, dated February 19, 1986 addressed to Mr.
22 Sostek from Mr. Hart.

23 I'd like that marked as Shurberg 118, please.

24 JUDGE FRYSIK: It may be marked.

25 (The document referred to was

1 marked for identification as
2 Shurberg Exhibit 118.)

3 MR. COLE: Thank you. And I will withhold an
4 offer of that, pending a witness.

5 Next, I'd like to have marked for identification
6 as Shurberg 119, a two-page letter on the letterhead of WHCT
7 18 letterhead, dated April 8, 1986 addressed to Mr. Sostek
8 and signed by Mr. Ramirez.

9 I'd like to have that marked as Shurberg 119,
10 please.

11 JUDGE FRYSIAK: It may be marked.

12 (The document referred to was
13 marked for identification as
14 Shurberg Exhibit 119.)

15 MR. COLE: And this was received into evidence in
16 the bankruptcy proceeding as Exhibit Number 82. And I offer
17 it on that basis.

18 MS. SCHMELTZER: No objection.

19 JUDGE FRYSIAK: Received.

20 (The document referred to,
21 having been previously marked
22 for identification as Shurberg
23 Exhibit 119, was received in
24 evidence.)

25 MR. COLE: Next, I'd like to have marked for

1 identification a two-page document which is a letter on WHCT
2 18 letterhead, dated April 18, 1986 addressed to Mr. Boling
3 from Mr. Sostek -- I'm sorry, from Mr. Ramirez. And it's
4 accompanied by a renovation contract payment summary. It's
5 a three-page document. I'm sorry. Two-page letter and a
6 one-page renovation contract payment summary.

7 I'd like that marked for identification as
8 Shurberg 120.

9 JUDGE FRYSIK: It may be marked.

10 (The document referred to was
11 marked for identification as
12 Shurberg Exhibit 120.)

13 MR. COLE: And this was received in the bankruptcy
14 proceeding as Exhibit Number 83, I believe. And on that
15 basis, I offer it here.

16 MS. SCHMELTZER: No objection.

17 JUDGE FRYSIK: Received.

18 (The document referred to,
19 having been previously marked
20 for identification as Shurberg
21 Exhibit 120, was received in
22 evidence.)

23 MR. COLE: Next, I would like identified for the
24 record as Shurberg 121, a one-page handwritten note on WHCT
25 18 stationery of some sort, dated it appears June 9, 1986,

1 although it may be September 9, 1986, addressed to Fred from
2 Rich.

3 I'd like that marked as Shurberg 121.

4 JUDGE FRYSIAK: It may be marked.

5

6 (The document referred to was
7 marked for identification as
8 Shurberg Exhibit 121.)

9 MR. COLE: Thank you. And this was received into
10 evidence in the bankruptcy proceeding as Exhibit Number 195.
11 And on that basis, I offer it here.

12 MS. SCHMELTZER: Your Honor, I have a legibility
13 problem with this document. It's very hard to understand
14 what this says.

15 MR. COLE: Well, I'm also happy to ask -- I
16 believe this is Mr. Ramirez's. I mean, if he's going to be
17 on the stand I can ask him about, too. So, if you want, we
18 can withhold receipt of it, pending cross-examination.

19 JUDGE FRYSIAK: All right.

20 MR. COLE: Next, I'd like to have marked for
21 identification a one-page document which is a letter on WHCT
22 18 stationery, dated September 11, 1986 addressed to John G.
23 Curry signed by Mr. Ramirez.

24 And I'd like that marked as Shurberg 122, please.

25 JUDGE FRYSIAK: It may be marked.

1 (The document referred to was
2 marked for identification as
3 Shurberg Exhibit 122.)

4 MR. COLE: And this was received into evidence in
5 the bankruptcy proceeding as Exhibit 196. And on that
6 basis, I offer it here.

7 MS. SCHMELTZER: No objection.

8 JUDGE FRYSIK: Received.

9 (The document referred to,
10 having been previously marked
11 for identification as Shurberg
12 Exhibit 122, was received in
13 evidence.)

14 MR. COLE: Thank you, Your Honor. Next, I have a
15 one-page letter which I would like marked as Shurberg 123.
16 It's on WHCT 18 letterhead. It's dated October 7, 1986.
17 It's addressed to Fred Boling, and it's from Mr. Ramirez.

18 And I'd like that marked as Shurberg 123, please.

19 JUDGE FRYSIK: It may be marked.

20 (The document referred to was
21 marked for identification as
22 Shurberg Exhibit 123.)

23 MR. COLE: And this also was received in the
24 bankruptcy proceeding, I understand, as Exhibit Number 92.
25 And on that basis, I offer it here.